

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE SUBURBAN TEAMSTERS )  
OF NORTHERN ILLINOIS WELFARE AND )  
PENSION FUNDS, )  
 )  
Plaintiffs, ) ) No. 2014 C 7453  
v. ) )  
 ) ) Judge Tharp  
 )  
KEVIN W. EDMIER, Individually )  
and d/b/a THE E COMPANY, )  
an Illinois corporation not in good standing, ) Magistrate Judge Cole  
 )  
Defendant. )

**MOTION FOR JUDGMENT IN SUM CERTAIN**

NOW COME the Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on September 25, 2014 for collection of delinquent contributions plus attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon KEVIN W. EDMIER, Individually and d/b/a THE E COMPANY, an Illinois corporation not in good standing was made on the Defendant on October 1, 2014 and a copy of the proof of service was filed with the court on October 8, 2014.
3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$1,071.93	Pension
\$1,404.00	Welfare
\$925.00	Attorneys fees
<u>\$432.00</u>	Court costs
\$3,832.93	

WHEREFORE, Plaintiffs pray for:

1. Entry of judgment against Defendant, KEVIN W. EDMIER, Individually and d/b/a THE E COMPANY, an Illinois corporation not in good standing, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION AND WELFARE FUNDS in the amount of \$3,832.93

TRUSTEES OF THE SUBURBAN TEAMSTERS  
OF NORTHERN ILLINOIS PENSION AND  
WELFARE FUNDS

s/John J. Toomey  
ARNOLD AND KADJAN  
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Dated: October 30, 2014